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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

GOOGLE LLC,

Plaintiff,

vs.

SONOS, INC.,

Defendant.

Case No. 3:20-cv-06754-WHA

Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF GOOGLE LLC'S REVISED
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PURSUANT TO THE
COURT'S OMNIBUS ORDER RE
MOTIONS TO SEAL (DKT. 518)**

I, Jocelyn Ma, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Google’s Revised Administrative Motion to File Under Seal Pursuant to the Court’s Omnibus Order Re Motions to Seal (Dkt. 518). If called as a witness, I could and would testify competently to the information contained herein.

3. Google requests an order granting leave to file under seal the portions of the documents listed below that the Court declined to seal without prejudice:

| Dkt. | Document | Portions Google Originally Sought to File Under Seal | Portions Google Now Seeks to File Under Seal | Designating Party |
|-------------------------|-----------------|---|---|--------------------------|
| Dkt. 210-3 | Exhibit 1 | Entire document (Dkt. 210) | Portions outlined in blue boxes | Google |
| Dkt. 252-3 / Dkt. 263-1 | Exhibit 1 | Portions outlined in red boxes (Dkt. 262) | Portions outlined in blue boxes | Google |

4. Google also respectfully requests an order granting leave to keep under seal the portions of the documents listed below that the Court declined to seal, but that contain references to highly confidential source code for Google’s products:

| Dkt. | Document | Portions Google Originally Sought to File Under Seal | Portions Google Now Seeks to File Under Seal | Designating Party |
|-------------|--|---|---|--------------------------|
| Dkt. 209-4 | Exhibit B | Portions outlined in red boxes (Dkt. 215) | Portions outlined in blue boxes on page 10 | Google |
| Dkt. 247-3 | Google’s Opposition to Sonos, Inc.’s (“Sonos”) Motion for Summary Judgment Pursuant to the Court’s Patent Showdown Procedure | Portions highlighted in yellow and green; portions outlined in red boxes (Dkt. 247) | Portion outlined in blue box on page 10 | Google |
| Dkt. 252-2 | Sonos’s Opposition to Google’s Motion | Portions highlighted in green | Portions outlined in blue boxes on | Google |

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|-------------------------|--|---|---|--------|
| | for Summary Judgment Pursuant to the Court's Patent Showdown Procedure | (Dkt. 262) | page 2 | |
| Dkt. 276-4 / Dkt. 277-3 | Exhibit 1 | Portions highlighted in yellow (Dkt. 276) | Portions outlined in blue boxes on page 4 | Google |

5. The portions of Dkts. 210-3, 252-3, 209-4, 247-3, 252-2, and 276-4 outlined in blue boxes contain references to highly confidential source code for Google's products that Google does not share publicly. The disclosure of such source code would harm the competitive standing that Google has earned through years of innovation by allowing Google's competitors to benefit from Google's investments in research and development and by revealing Google's trade secrets and sensitive aspects of its proprietary systems and designs, to Google's competitors. I understand that this Court and other courts in the Northern District of California have sealed similar source code references. *See, e.g.*, Dkt. 518 at 6, 8, 12, 13; *see also In re Koninklijke Philips Pat. Litig.*, No. 18-CV-01885-HSG, 2020 WL 1865294, at *2 (N.D. Cal. Apr. 13, 2020); *X One, Inc. v. Uber Techs., Inc.*, No. 16-CV-06050-LHK, 2020 WL 718310, at *3 (N.D. Cal. Feb. 12, 2020).

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct. Executed on March 8, 2023, in San Francisco, California.

DATED: March 8, 2023

By: /s/ Jocelyn Ma
Jocelyn Ma

ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Jocelyn Ma has concurred in the aforementioned filing.

DATED: March 8, 2023

/s/ Charles K. Verhoeven

Charles K. Verhoeven